



Control Number: 51415



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**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**MOTION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR ADMISSION
OF ADDITIONAL EVIDENCE PURSUANT TO TEXAS RULE OF EVIDENCE 107**

Southwestern Electric Power Company (SWEPCO or the Company) moves for the admission of additional evidence in this proceeding pursuant to Texas Rule of Evidence 107 – Rule of Optional Completeness. In support, SWEPCO shows as follows:

At the Hearing on the Merits, the Administrative Law Judges (ALJs) ruled that parties could offer evidence, by Friday, May 28, 2021 for inclusion in the record under the doctrine of optional completeness. Accordingly, this motion is timely filed.

SWEPCO's optional completeness request goes to Commission Staff (Staff) Exhibit No. 67. Staff Exhibit No. 67 provides excerpts from the Company's response to Staff's Sixth Request for Information (RFI). Specifically, Staff Ex. No. 67 provides SWEPCO's response to Staff RFI 6-8, which requests workpapers showing the calculation, derivation, or source of the monthly amounts to annualize the "Debt issue-disc-loss." Staff Ex. No. 67 provides the response to Staff RFI 6-8, but does not include the referenced attachment. Because Attachment 1 contains the monthly detail requested by the RFI, it should be included in the record under Tex. R. Evid. 107. Without the attachment, the response is incomplete. Because SWEPCO does not know how Staff may reference the response to Staff RFI 6-8, it is necessary to have the complete response in the record to fully address any issue(s) that may arise. Therefore, SWEPCO offers its entire response to Staff RFI 6-8 as SWEPCO Exhibit No. 88.

A copy of SWEPCO Exhibit No. 88 is attached to this motion for the ALJs review. Upon admission, SWEPCO will provide the requisite copies to the court reporter and the ALJs for the appellate record and upload the exhibit to the iManage system established in this docket.

SWEPCO respectfully requests the ALJs grant its motion for admission of SWEPCO Exhibit No. 88 as optional completeness to Staff Exhibit No. 67 pursuant to Tex. R. Evid. 107. SWEPCO requests such other and further relief to which it may show itself justly entitled.

Respectfully submitted,

Melissa Gage
State Bar No. 24063949
Email: magage@acp.com
acpaustintx@acp.com (Service)

Leila Melhem
State Bar No. 24083492
Email: lmelhem@acp.com
acpaustintx@acp.com (Service)

400 West 15th Street, Suite 1520

Austin, Texas 78701

Telephone: (512) 481-3320

Facsimile: (512) 481-4591

**AMERICAN ELECTRIC POWER SERVICE
CORPORATION**

William Coe
State Bar No. 00790477
Email: wcoc@dwmrlaw.com
Kerry McGrath
State Bar No. 13652200
Email: kmcgrath@dwmrlaw.com
Patrick Pearsall
State Bar No. 24047492
Email: ppearsall@dwmrlaw.com
P.O. Box 1149
Austin, Texas 78767
Telephone: (512) 744-9300
Facsimile: (512) 744-9399
DUGGINS WREN MANN & ROMERO, LLP

By: 
Patrick Pearsall

**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on May 28, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.


Patrick Pearsall

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Respectfully submitted,

Melissa Gage
State Bar No. 24063949
Email: magage@acp.com
acpaustintx@acp.com (Service)

Leila Melhem
State Bar No. 24083492
Email: lmelhem@acp.com
acpaustintx@acp.com (Service)

400 West 15th Street, Suite 1520

Austin, Texas 78701

Telephone: (512) 481-3320

Facsimile: (512) 481-4591

**AMERICAN ELECTRIC POWER SERVICE
CORPORATION**

William Coe
State Bar No. 00790477
Email: wcoc@dwmrlaw.com
Kerry McGrath
State Bar No. 13652200
Email: kmcgrath@dwmrlaw.com
Patrick Pearsall
State Bar No. 24047492
Email: ppearsall@dwmrlaw.com
P.O. Box 1149
Austin, Texas 78767
Telephone: (512) 744-9300
Facsimile: (512) 744-9399
DUGGINS WREN MANN & ROMERO, LLP

By: 
Patrick Pearsall

**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY**

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Patrick Pearsall